

FOR INCLUSION ON TECHNICAL SPECIFICATION WEB PAGE

THE FOLLOWING EXAMPLE OF AN APPLICATION WAS PREPARED BY THE NRC STAFF TO FACILITATE THE USE OF THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP). THE MODEL PROVIDES THE EXPECTED LEVEL OF DETAIL AND CONTENT FOR AN APPLICATION TO ADOPT REVISION 2 TO TSTF-373, "INCREASE CIV COMPLETION TIME IN ACCORDANCE WITH CE-NPSD-1168," USING CLIIP. LICENSEES REMAIN RESPONSIBLE FOR ENSURING THAT THEIR ACTUAL APPLICATION FULFILLS THEIR ADMINISTRATIVE REQUIREMENTS AS WELL AS NRC REGULATIONS.

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

SUBJECT: PLANT NAME
DOCKET NO. 50-
APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO
EXTEND THE COMPLETION TIME FOR SELECTED CONTAINMENT
ISOLATION VALVES

Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), [LICENSEE] is submitting a request for an amendment to the technical specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment would extend to 7 days the completion time to isolate the affected penetration flow path when selected containment isolation valves (CIVs) are inoperable in either a penetration flow path with two CIVs or in a penetration flow path with one CIV in a closed system. The change is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-373, "Increase CIV Completion Time in Accordance with CE-NPSD-1168," Revision 2. The availability of this TS improvement was announced in the *Federal Register* on [DATE OF NOTICE OF AVAILABILITY] as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides a description of the proposed change and confirmation of applicability. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. *[IF APPLICABLE: Enclosure 3 provides the existing TS Bases pages marked-up to reflect the proposed change (for information only). Changes to the TS Bases will be provided in a future update in accordance with the Bases Control Program.]* There are no new regulatory commitments associated with this proposed change.

[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated [STATE] Official.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by [LICENSEE] to make this request and that the foregoing is true and correct. [Note that request may be notarized in lieu of using this oath or affirmation statement].

If you should have any questions regarding this submittal, please contact [].

Sincerely,

Name, Title

Enclosures: 1. Description and Assessment
 2. Proposed Technical Specification Changes
 3. Proposed Technical Specification Bases Changes (if applicable)

cc: NRR Project Manager
 Regional Office
 Resident Inspector
 State Contact

Description and Assessment

1.0 DESCRIPTION

The proposed License amendment extends the completion time in Technical Specification [3.6.3, "Containment Isolation Valves (Atmospheric and Dual)"]. The proposed change to the Technical Specifications (TS) would extend to 7 days the completion time to isolate the affected penetration flow path when selected containment isolation valves (CIVs) are inoperable in either a penetration flow path with two CIVs or in a penetration flow path with one CIV in a closed system.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-373, "Increase CIV Completion Time in Accordance with CE-NPSD-1168," Revision 2. The availability of this technical specification improvement was announced in the *Federal Register* on [DATE] as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the safety evaluation published on November 13, 2003 (68 FR 64375), as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-373 (i.e., CE-NPSD-1168-A, "Joint Applications Report for Containment Isolation Valve AOT [allowed outage time] Extension," dated January 2001. [LICENSEE] has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] Technical Specifications.

2.2 Optional Changes and Variations

[LICENSEE] is not proposing any variations or deviations from the technical specification changes described in TSTF-373 or the NRC staff's model safety evaluation published on November 13, 2003.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

[LICENSEE] has reviewed the proposed no significant hazards consideration determination published on November 13, 2003 (68 FR 64375) as part of the CLIIP. [LICENSEE] has concluded that the proposed determination presented in the notice is applicable to [PLANT] and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

The notice for comment published on November 13, 2003 (68 FR 64375), identified six plant-specific verifications for licensees to address in their applications to support the NRC staff's review of TS changes related to TSTF-373. [LICENSEE] has performed the requested verifications and each item is addressed below:

- (a) "The supporting information in CE NPSD-1168-A is applicable to their plant and the specific penetrations for which the licensee is requesting an extended completion time (i.e., the specific penetrations are consistent with those analyzed per the risk guidelines of Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decision Making: Technical Specifications," and fall within the 14 containment penetration configurations in the report)."

[LICENSEE] has confirmed that the supporting information in CE NPSD-1168-A is applicable to [PLANT, UNIT NOS.]. The penetrations affected by this change fall within the 14 containment penetration configurations in the report. [Alternatively, identify those containment penetration configurations not addressed by the topical report and provide the plant-specific analysis to support the proposed change (see item e).]

- (b) "They have evaluated and substantiated that external events will not affect the results of the analysis supporting the extended completion times."

[LICENSEE] has evaluated and substantiated that external events will not affect the results of the analysis supporting the extended completion times.

- (c) "Any plant-specific analyses used to support the amendment request have used an acceptable probabilistic risk analyses (PRA) quality as described in RG 1.177."

To the degree that [LICENSEE] has performed plant-specific probabilistic risk analyses (PRA) to support the amendment request, the PRA quality is consistent with the guidance in RG 1.177 and the analyses provided in support of the NRC approval of CE NPSD-1168-A.

- (d) "Plant-specific implementation of this change includes verification of the operability of the remaining CIV(s) in a penetration flow path before entering the extended completion time for corrective maintenance. Plant-specific implementation of this change includes verification that the affected penetration will remain physically intact or be isolated so as to not permit a release to the outside environment."

The implementation of this change at [PLANT, UNIT NOS.] includes (1) verification of the operability of the remaining CIV(s) in a penetration flow path before entering the extended completion time for corrective maintenance, and (2) verification that the affected penetration will remain physically intact or be isolated so as to not permit a release to the outside environment.

- (e) "They have verified that the additive nature of multiple failed CIVs and the possibility of entering multiple allowed outage times (AOTs) have been addressed as part of the analysis."

[LICENSEE] has verified that the additive nature of multiple failed CIVs and the possibility of entering multiple allowed outage times (AOTs) have been adequately addressed for [PLANT,

UNIT NOS.] as part of the analyses supporting the implementation of this change at [PLANT, UNIT NOS.].

- (f) “Applications that propose changes for configurations not addressed by the groups described in CE NPSD-1168-A include a plant-specific analysis to justify the completion time extension.”

This application does not propose changes for configurations not addressed by the groups described in CE NPSD-1168-A. [Alternatively, identify the affected penetrations and provide the plant-specific analysis to support the proposed change.]

4.0 ENVIRONMENTAL EVALUATION

[LICENSEE] has reviewed the environmental evaluation included in the model safety evaluation published on November 13, 2003 (68 FR 64375) as part of the CLIIP. [LICENSEE] has concluded that the NRC staff’s findings presented in that evaluation are applicable to [PLANT] and the evaluation is hereby incorporated by reference for this application.

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Enclosure 2

POSSIBLE CHANGES TO TS BASES PAGES

(Optional - Bases to be updated per TS Bases Control Program)

Enclosure 3

Distribution:

PUBLIC

PDIV-1 Reading File

TBoyce

LHill

Accession Number: ML040490270

ADAMS Template: NRR-106

File:C:\ORPCheckout\FileNET\ML040490270.wpd

OFC	NRR/DLPM/PM	NRR/DLPM/LA	NRR/DLPM/PDIV
NAME	W Reckley	DJohnson	RGramm
DATE	02/01/04	2/6/04	2/10/04

OFFICIAL AGENCY RECORD